

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: GENERIC PHARMACEUTICALS
PRICING ANTITRUST LITIGATION

MDL No. 2724
16-MD-2724

HON. CYNTHIA M. RUFE

THIS DOCUMENT RELATES TO:

ALL ACTIONS

**REPLY MEMORANDUM CONCERNING DEFENDANT ARA APRAHAMIAN'S
MOTION FOR LEAVE TO FILE UNDER SEAL**

On behalf of Defendant Ara Aprahamian, we moved to seal the memorandum of law in support of Mr. Aprahamian's stay motion (the "Memorandum," Dkt. 1538) because it quotes and describes prior filings that this Court ordered sealed (the "Sealed Documents"). The Memorandum is currently filed with the Court under seal. In their opposition, Plaintiffs argue that the Memorandum should not be sealed because, although it quotes and describes the Sealed Documents, those quotations and descriptions are limited and do not refer to any truly confidential material. We do not disagree with Plaintiffs' assessment. We moved to seal the Memorandum in an abundance of caution, to avoid violating this Court's sealing order by placing sealed material on the public docket. Since the filing of Plaintiffs' opposition, we have raised this issue with the parties who originally moved to seal the Sealed Documents, and it is our understanding that none of those parties objects to unsealing the Memorandum. Accordingly, Mr. Aprahamian does not object to unsealing the Memorandum (Dkt. 1538) should this Court deem it appropriate.

Date: October 27, 2020

Respectfully submitted,

/s/ G. Robert Gage, Jr.

G. Robert Gage, Jr.

Gage Spencer & Fleming LLP

410 Park Avenue

New York, New York 10022

Tel: 212-768-4900

grgage@gagespencer.com

Attorneys for Ara Aprahamian

CERTIFICATE OF SERVICE

I hereby certify that on October 27, 2020, I caused a copy of the foregoing Reply Memorandum Concerning Defendant Ara Aprahamian's Motion for Leave to File Under Seal to be served on counsel of record via the Court's ECF system.

/s/ G. Robert Gage, Jr.
G. Robert Gage, Jr.
Counsel for Defendant Ara Aprahamian